

Intelligent Vehicle Highway Society of America

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June 3, 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**VIA MESSENGER**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**ORIGINAL**Re: IC Docket 94-31

Dear Mr. Caton:

On behalf of the Intelligent Vehicle-Highway Society of America ("IVHS AMERICA") this letter will respond to the request for Comments concerning the final Agenda for WRC-97 and the preliminary Agenda for WRC-99 in the Commission's Notice of Inquiry, FCC 94-96 (May 5, 1994) ("NOI") commencing the above-referenced proceeding. For the reasons discussed below, IVHS AMERICA urges that the FCC strongly advocate at WRC-95 the consideration of international spectrum allocations for IVHS services on both the final WRC-97 Agenda and the preliminary WRC-99 Agenda.

IVHS AMERICA is a non-profit educational and scientific organization whose purpose is to coordinate and promote the research, development and deployment of intelligent vehicle-highway systems ("IVHS") in the United States. With a membership comprised of federal, state and local government, private industry, and academic interests, IVHS AMERICA is a public/private partnership and serves as a utilized Federal Advisory Committee to the U.S. Department of Transportation ("USDOT").

The National IVHS Program Plan under joint development by USDOT and IVHS AMERICA preliminarily has identified twenty eight IVHS user services, including, among others, MAYDAY communications, Hazardous Materials monitoring, electronic payment (such as electronic toll) services, and collision avoidance services. A list of these user services is contained in the IVHS Architecture Development Program Interim Status Report further discussed below. The National Program Plan is expected to be final by year's end.

USDOT, in addition, has selected four teams to design competing nationwide IVHS architectures to accommodate the provision of IVHS user services. An "Interim Status Report" concerning the work of these four teams was published at IVHS AMERICA's recent Fourth Annual Meeting in Atlanta, Georgia.

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USDOT is expected to select one or more of these teams to continue their work through a "Phase 2" of architecture development, looking toward the development of a nationwide IVHS architecture by mid-1996. A copy of the IVHS Architecture Development Program Interim Status Report is enclosed with this letter.

The efforts of many parties thus far in developing and deploying IVHS products in the U.S. has established clearly that the satisfaction of the communications requirements associated with the IVHS user services will be central to the timely deployment of IVHS in this nation. Given these considerations, IVHS AMERICA has organized its Communications Committee (the "Committee") to study the communications requirements of the IVHS user services, build consensus regarding those requirements and assist IVHS AMERICA in interfacing with the spectrum policymakers at NTIA and the FCC. Committee membership is comprised of representatives of the public and private sector IVHS community with unique expertise in IVHS communications requirements. Over the past year, the Committee has undertaken substantial efforts toward promoting the identification and discussion of IVHS communications requirements within the IVHS community. To this end, IVHS AMERICA disseminated notice of the issues discussed in the NOI throughout its membership and requested that its Communications Committee address this topic at the May 24 meeting of its Wireless Communications Subcommittee. These Comments are submitted as a result of that meeting.<sup>1</sup>

In its NOI (at para. 40), the FCC has requested Comments on topics that do not appear on the preliminary WRC-97 Agenda, but whose consideration at WRC-97 nevertheless would be of significance to the U.S. IVHS AMERICA believes that the timely consideration of international IVHS spectrum allocation issues at WRC-97 is indeed critical to the U.S.

IVHS developmental and deployment efforts are being conducted globally. The First World Congress on Advanced Transport Telematics (ATT) & Intelligent Vehicle-Highway Systems will be held in Paris this year from November 30 through December 3. The Paris World Congress is being organized jointly by IVHS AMERICA and the European Road Transport Telematics Implementation Coordination Organisation, or "ERTICO." ERTICO, a member-based organization, has as its main objective the effective and early implementation of ATT in Europe. The Paris World Congress, in

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<sup>1</sup>The views expressed herein are those of IVHS AMERICA and are not necessarily shared by each of the individual members of the Society or of the Committee.

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addition, will benefit from the participation of the Vehicle, Road and Transportation Intelligence System In Japan, or "VERTIS." Enclosed with this letter is a pamphlet describing the upcoming Paris World Congress in more detail.

We expect the Paris World Congress to be a singularly important event in the worldwide development and deployment of IVHS technologies. IVHS AMERICA as a sponsoring organization of the World Congress has ensured that the issue of international IVHS spectrum allocations will receive much attention both through the presentation of papers and panel discussions at the Congress. We believe that the U.S. should be the world's leader in the development of IVHS products, and are hopeful that this and future World Congresses will confirm the position of U.S. leadership in this important endeavor.

We also believe that U.S. leadership concerning the issue of international IVHS interoperability and equipment compatibility (and thus international IVHS spectrum allocations) will promote the timely deployment of IVHS services in this country and otherwise enhance the ability of U.S. companies to compete in global IVHS markets. The importance of these goals can not be overstated. Experts have estimated that IVHS can reduce traffic fatalities by eight percent, or 3,300 lives saved and 400,000 injuries avoided each year at current traffic levels. IVHS is expected to relieve traffic congestion in the U.S. by up to 20 percent in the most heavily traveled corridors, and to alleviate congestion resulting from accidents, roadway construction and maintenance operations and associated detours throughout the nation, in rural as well as urban areas. The enhancement in economic productivity in the U.S. from the deployment of IVHS has been estimated at \$100 billion annually. IVHS will generate thousands of new, high technology, high pay jobs and will work in concert with the National Information Infrastructure.

IVHS AMERICA recognizes that much work remains to be done to identify IVHS communications requirements and to develop a U.S. position on international requirements to be addressed at WRC-97. We note, however, that by WRC-97 the National Program Plan will have been final for three years, the national system architecture will have been final for at least a year and three IVHS World Congresses will have been held, at each of which we expect the issue of international IVHS spectrum allocations to be a central topic of discussion. In short, much information that is not yet known will be available for consideration at WRC-97.

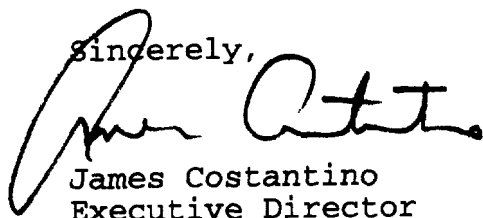
Accordingly, IVHS AMERICA believes that the issue of international spectrum allocations will be ripe for consideration

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at WRC-97 from a position of U.S. leadership. While we recognize that IVHS is not on the WRC-97 Preliminary Agenda, we believe that delay beyond 1997 may impair the ability of the U.S. to occupy a position of world leadership on these issues. Delay in the consideration of these issues may also deter the timely introduction of IVHS user services in the U.S. We ask therefore that the FCC strongly advocate the consideration of international IVHS spectrum allocation issues at WRC-97. We ask also that IVHS be identified for consideration at WRC-99 to resolve any issues remaining from WRC-97.

IVHS AMERICA appreciates the opportunity to submit these views and expresses its gratitude for the FCC's continued efforts to promote the timely deployment of IVHS in the U.S.

Sincerely,



James Costantino  
Executive Director

Enclosures (2).

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